



Eric Gonzalez
District Attorney

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KINGS COUNTY**

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[INSERT NAME]
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: **DAWN PUIG**

MOS TAX: [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

ON DECEMBER 6, 2015, POLICE OFFICER DAWN PUIG, SHIELD NUMBER 2778, SIGNED, AS THE DEPONENT, A CRIMINAL COURT COMPLAINT (KINGS COUNTY DOCKET NUMBER 2015KN078859), WHICH CHARGED THE DEFENDANT WITH TWO COUNTS OF OPERATING A MOTOR VEHICLE WHILE UNDER THE INFLUENCE OF ALCOHOL OR DRUGS (VTL 1192[1], [3]) AND ONE COUNT OF RECKLESS DRIVING (VTL 1212). IN THE COMPLAINT, PO PUIG STATED THAT, AT ABOUT 6:40 P.M. AT 1449 BROADWAY, SHE HAD OBSERVED THE DEFENDANT DRIVING A CHEVROLET VEHICLE WITH THE ENGINE RUNNING AND KEYS IN THE IGNITION AND THAT THE DEFENDANT HAD COLLIDED WITH THREE VEHICLES PARKED ON THE STREET. PO PUIG FURTHER STATED IN THE COMPLAINT THAT, AT THE SAME APPROXIMATE TIME AND PLACE, SHE HAD OBSERVED THE DEFENDANT EXHIBITING SIGNS OF INTOXICATION: TO WIT, SLURRED SPEECH, RED WATERY EYES, ODOR OF ALCOHOLIC BEVERAGE ON BREATH, AND AN UNSTEADY GAIT.

ON DECEMBER 21, 2015, PO PUIG STATED TO THE ADA ASSIGNED TO THE CASE THAT SHE HAD NOT IN FACT SEEN THE DEFENDANT DRIVING THE SUBJECT VEHICLE, NOR HAD SHE SEEN THAT VEHICLE COLLIDE WITH OTHER VEHICLES, BECAUSE SHE HAD ARRIVED ON THE SCENE LATER, WHILE THE DEFENDANT WAS ALREADY BEING TREATED BY EMS PERSONNEL. PO PUIG EXPLAINED THAT WHEN SHE HAD SIGNED THE COMPLAINT, SHE HAD BEEN UP FOR OVER 22 HOURS AND WAS CONFUSED. PO PUIG FURTHER EXPLAINED THAT SHE THOUGHT THAT, WHEN SIGNING AS THE "DEPONENT," SHE COULD RELY ON HER COMPLETE INVESTIGATION OF THE INCIDENT, INCLUDING THE EMS TRANSCRIPT, THE 911 EVENT LOG, THE ACCOUNT OF AN EYEWITNESS, AND HER OWN PERSONAL OBSERVATIONS ON THE SCENE. PO PUIG STATED THAT HER COMPLETE INVESTIGATION HAD LED HER TO THE CONCLUSION THAT THE DEFENDANT WAS THE PERSON OPERATING THE MOTOR VEHICLE.

Disclosure #2 (PENDING):

THE FOLLOWING ALLEGATIONS, DATED 12/29/20, ARE PENDING AGAINST MOS PUIG:

■ [REDACTED]

BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE UNAWARE OF ANY PENDING AND OR SUBSTANTIATED CCRB ALLEGATIONS AGAINST THIS OFFICER.

Eric Gonzalez
District Attorney
Kings County